

**HONORABLE BARBARA J. ROTHSTEIN
HONORABLE S. KATE VAUGHAN**

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

MATT WRIGHT;

Plaintiff,

VS.

STATE OF WASHINGTON, WASHINGTON
STATE DEPARTMENT OF CORRECTIONS,
CHRISTINE GOMES, TRACI DRAKE, DAVID
CHRISTENSEN, CAROL SMITH, LOUISE
STEMLER, JASON MARTIN, JASON RICHER,
ALEX COSTA, RISA KLEMME, NIKKI RYMER,
and DOES I-X inclusive,

Defendants.

NO. C23-1326-BJR-SKV

**AGREED STIPULATION AND
(PROPOSED) ORDER
EXTENDING CASE SCHEDULE
DEADLINES**

Noted for Consideration:

January 12, 2024

I. STIPULATION

For good cause shown and pursuant to the Court's Scheduling Order (ECF 8), all parties to this matter stipulate as follows:

1. The parties have been actively engaged in discovery in this matter, including exchange of written interrogatories and request for production. The parties intend to engage in depositions of fact witnesses and parties.

2. The current expert discovery deadline is March 20, 2024. Due to the breadth of discovery sought and the need for reviewing and redacting records sought by the parties, the parties will

**AGREED STIPULATION AND (PROPOSED)
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DEADLINES
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1 need additional time to complete discovery. The parties anticipate that an additional six (6) months
2 from the current deadline will suffice.

3. Extending the discovery deadline will make it difficult to maintain the remaining dates on
the case schedule order, including disclosure of expert testimony, expert related motions and dispositive
motions, as well the ability to evaluate the case for potential pretrial mediation. Therefore, the parties
request that all remaining dates on the case schedule also be extended as follows:

Event	Current Deadline	New Deadline
Expert Disclosures	January 19, 2024	July 19, 2024
Rebuttal Expert Disclosures	February 16, 2024	August 16, 2024
Discovery Motions	February 26, 2024	August 26, 2024
Discovery Deadline	March 20, 2024	September 20, 2024
Dispositive Motions	April 19, 2024	October 21, 2024
Motions in Limine	August 12, 2024	February 12, 2025
Joint Pretrial Statement	August 19, 2024	February 19, 2025
Jury Trial	September 16, 2024	March 17, 2025

STIPULATED TO THIS 12th DAY OF January 2024.

LAW, LYMAN, DANIEL, KAMERRER
& BOGDANOVICH, P.S.

/s/ *Matthew Sonneby*
/s/ *John E. Justice*

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**AGREED STIPULATION AND (PROPOSED)
ORDER EXTENDING CASE SCHEDULE
DEADLINES
NO. C23-1326-BJR-SKV – 2**

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/s/ Darryl Parker (per email authorization)
Darryl Parker, WSBA No. 30770
Attorney for Plaintiff
CIVIL RIGHTS JUSTICE CENTER PLLC
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[PROPOSED] ORDER

Pursuant to the stipulation of the parties, and for good cause shown, the Case Schedule Order is modified as follows:

Event	Current Deadline	New Deadline
Expert Disclosures	January 19, 2024	July 19, 2024
Rebuttal Expert Disclosures	February 16, 2024	August 16, 2024
Discovery Motions	February 26, 2024	August 26, 2024
Discovery Deadline	March 20, 2024	September 18, 2024
Dispositive Motions	April 19, 2024	October 18, 2024
Motions in Limine	August 12, 2024	February 5, 2025
Joint Pretrial Statement	August 19, 2024	February 18, 2025
Pretrial Conference	September 3, 2024 at 10:30am	March 4, 2025 at 10:30am
Jury Trial	September 16, 2024	March 17, 2025

DONE THIS 22nd DAY OF January, 2024

S. Kate Vaughan
S. KATE VAUGHAN
United States Magistrate Judge

**AGREED STIPULATION AND (PROPOSED)
ORDER EXTENDING CASE SCHEDULE
DEADLINES
NO. C23-1326-BJR-SKV – 3**

1
2 **CERTIFICATE OF FILING AND SERVICE**
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4 I hereby certify under penalty of perjury under the laws of the United States of America that on
5 this date, I caused to be electronically filed the foregoing document, and this Certificate of Filing & Service
6 with the CM/ECF e-filing portal which will cause the same to be served on the following:
7

8 **Plaintiffs Attorney:**
9

10 Darryl Parker
11 CIVIL RIGHTS JUSTICE CENTER PLLC
12 1833 N 105th Street, Suite 201
13 Seattle, WA 98133
14 dparker@civilrightsjusticecenter.com

15 DATED this 12th day of January, 2024 at Tumwater, WA.

16 */s/ Lisa Gates*

17 _____
18 Lisa Gates, Legal Assistant

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**AGREED STIPULATION AND (PROPOSED)
ORDER EXTENDING CASE SCHEDULE
DEADLINES
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